

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

**UMUOJI IMPROVEMENT UNION
(NORTH AMERICAN), INC.,**

Plaintiff

VS

**UMUOJI IMPROVEMENT UNION
(NORTH AMERICA), INC, UMUOJI
IMPROVEMENT UNION,
MASSACHUSETTS INC., VICTOR IDE
OKOYE AND OGOR OKOYE**

Defendants

Defendants' Notice to Court Pursuant to the Court's Memorandum and Order on
Plaintiff's Motion for Preliminary Injunction Dated May 4, 2021

Now comes Counsel for the aforementioned Defendants, who through this filing seeks to notify this Court that Defendants are agreeable to the court's appointment of a master and/or custodian as outlined in the Memorandum and Order of this Court dated May 4, 2021, whose role would be limited to the supervision of an emergency meeting of the membership to chose managers of the organization, oversee the adoption of a new, comprehensible by-laws and make a written report to the court.

Defendants further state that their attempts to meet with the other side to settle this matter out of court was rejected by Plaintiff's Attorney on May 12, 2021 who instead of responding to this offer, merely restated the terms of their original proposal on March 4, 2021.

Respectfully submitted,

/s/

Ogor Winnie Okoye
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Dated: May 14, 2021

CERTIFICATE OF SERVICE

I hereby certify that I have served Defendants' Notice of their agreement to the appointment of a master/custodian by this court on the aforementioned matter via Electronic Filing on Plaintiff's Counsel, Travis T. Pregent, Esq. on the date set forth below in accordance with the Federal Rules of Civil Procedure and the Court's Local Rules.

Dated: May 14, 2021

/s/Ogor WinnieOkoye
